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8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **OAKLAND DIVISION**

11 THE PEOPLE OF THE STATE OF CALIFORNIA, EX  
12 REL. ROB BONTA, ATTORNEY GENERAL OF  
13 CALIFORNIA,

14 Plaintiff,

15 vs.

16 3M COMPANY; AGC CHEMICALS AMERICAS,  
17 INC.; ARCHROMA, U.S., INC.; ARKEMA, INC.;  
18 BUCKEYE FIRE EQUIPMENT COMPANY;  
19 CARRIER GLOBAL CORPORATION; CHEMGUARD,  
20 INC.; THE CHEMOURS COMPANY; THE  
21 CHEMOURS COMPANY FC, LLC; CLARIANT  
22 CORPORATION; CORTEVA, INC.; DUPONT DE  
23 NEMOURS, INC.; DYNAX CORPORATION; E.I. DU  
PONT DE NEMOURS AND COMPANY; KIDDE-  
FENWAL, INC.; NATIONAL FOAM, INC.; TYCO  
FIRE PRODUCTS, L.P.; UTC FIRE & SECURITY  
AMERICAS CORPORATION, INC.; and DOES 1  
through 100, INCLUSIVE,

24 Defendants.

Case No. 4:22-cv-09001-HSG

**JOINT STIPULATION AND  
ORDER FOR  
ENLARGEMENT OF TIME  
REGARDING PLAINTIFF'S  
MOTION FOR REMAND**

Hon. Haywood S. Gilliam, Jr.

Action Filed: November 10, 2022  
Trial Date: None Set

Pursuant to Civil Local Rule 6-2, Plaintiff People of the State of California (“Plaintiff”) and Defendants 3M Company (“3M”), Chemguard, Inc. (“Chemguard”), and Tyco Fire Products, L.P. (“Tyco”) (together with Plaintiff, the “Parties”) file this Joint Stipulation and [Proposed] Order for Enlargement of Time Regarding Plaintiff’s Motion For Remand (the “Motion for Remand,” Dkt. 22):

WHEREAS, Plaintiff filed the Complaint on November 10, 2022, in Alameda County Superior Court (Case No. 22CV021745), and has served a number of Defendants in the case with the Summons and Complaint;

WHEREAS, Defendants 3M, Chemguard, and Tyco (the “Removing Defendants”) removed this case from Alameda County Superior Court to this Court on December 20, 2022 (Dkt. 1);

WHEREAS, Plaintiff filed the Motion for Remand on December 30, 2022 (Dkt. 22);

WHEREAS, presently, Defendants’ opposition brief is due by January 13, 2023, Plaintiff’s reply brief is due by January 20, 2023, and Plaintiff’s Motion for Remand has been noticed for hearing on May 4, 2023;

WHEREAS, the Parties have conferred and have agreed that Removing Defendants’ opposition to the Motion to Remand will be due by February 3, 2023 and Plaintiff’s reply will be due by February 24, 2023;

WHEREAS, attached to this Stipulation is the Declaration of Daniel D. Queen setting forth the reasons for the requested enlargement of time, disclosing all previous time modifications, and describing the effect the requested time modification would have on the rest of the schedule in this case pursuant to N.D. Civil Local Rule 6-2;

WHEREAS, the Parties assert that good cause exists for these extensions. *See* Fed. R. Civ. P. 6(b)(1). The parties have agreed to the enlargement of time as set forth in this stipulation; the stipulated enlargement of time will only extend the briefing schedule for the Motion for Remand and will not postpone the previously set May 4, 2023 hearing date; and, no party will suffer any prejudice by continuing the opposition and reply deadlines;

WHEREAS, there has only been one previous time modification in this case, as the Parties previously stipulated that the deadlines for all Defendants to answer, move, or otherwise respond to the Complaint and the deadlines for the Parties to provide Rule 26 initial disclosures are stayed pending the Judicial Panel on Multidistrict Litigation's final decision on whether this matter should be transferred to the multidistrict litigation captioned *In re: Aqueous Film-Forming Foam Products Liability Litig.*, MDL No. 2873 (D.S.C.);

NOW THEREFORE, the Parties, through their undersigned counsel, hereby stipulate, agree and respectfully request that the Court enter an Order establishing the following:

1. Removing Defendants may submit their response to Plaintiff's Motion for Remand by February 3, 2023; and
2. Plaintiff may submit its reply in support of its Motion for Remand by February 24, 2023.

**IT IS SO STIPULATED.**

Dated: January 9, 2023

By: /s/ Daniel D. Queen  
Daniel D. Queen

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Attorneys for Defendant 3M Company

9 Dated: January 9, 2023

By: /s/ Ryan E. Cosgrove  
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Attorney for Defendants  
Tyco Fire Products LP and Chemguard, Inc.

17 Dated: January 9, 2023

THE PEOPLE OF THE STATE OF CALIFORNIA

18 By: /s/ Nicholas G. Campins  
19 Nicholas G. Campins

20 Attorneys for Plaintiff The People of the State of  
21 California, ex rel. Rob Bonta, Attorney General of  
22 California

23  
24 PURSUANT TO STIPULATION, IT IS SO ORDERED:

25  
26 DATED: 1/10/2023

27 BY:   
28 HON. HAYWOOD S. GILLIAM, JR.